

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	CRIMINAL NO. 13-10200-GAO
)	
DZHOKHAR TSARNAEV)	

**STATUS REPORT AND JOINT MOTION FOR EXTENSION OF DEADLINE
RE: JOINT LISTING OF DOCKET ENTRIES THAT SHOULD
BE UNSEALED AND SUPPORTING BASIS FOR CONTINUED SEALING**

The defendant, Dzhokhar Tsarnaev, and the United States, by and through counsel, respectfully submit this status report regarding efforts to comply with the Court's Scheduling Order regarding docket entries currently under seal, *see* D.E. 1605, as well as a request to extend the deadline regarding some of the docket entries.

At the parties' request, the Court extended the deadline for filing a response to the Court's Order to this day, January 22, 2016. During the past several weeks, the parties have regularly conferred and exchanged positions regarding the more than 900 pleadings and exhibits that were the subject of sealing motions. As of the date of this filing, the parties have identified 621 pleadings and exhibits that the parties have agreed can be unsealed. Finalization of that list, however, is still ongoing and likely will not be accomplished before the close of business this day.

Additionally, the parties have agreed to redact or consider redactions in lieu of complete sealing of specific documents. The process of redaction, however, is extremely labor intensive and will take substantial additional resources and time to accomplish.

Finally, the effort to identify which pleadings were agreed upon and which would be the subject of dispute has occupied all of the parties' attention to this point. Having now come to agreement that the majority of the pleadings and exhibits can be unsealed, the parties will need additional time to focus on the disputed docket entries in order to comply with the Court's Order that the parties produce "a chart setting forth each disputed docket entry by docket number and document title, the supporting party's basis for continuing the seal, and the opposing party's response." D.E. 1605.

The parties therefore jointly request the following:

1. The parties provide a joint list of Docket Entries that can be unsealed to the Clerk's Office by the close of business this Monday, January 25, 2016;
2. The Court set a deadline for a list of additional Docket Entries for which a redacted version can be unsealed, along with the proposed redacted versions themselves, by February 12, 2016; and
3. The Court extend the deadline for submitting the chart setting forth disputed docket entries to February 12, 2016.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on January 22, 2016.

/s/ Timothy G. Watkins